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October 16, 2006

BY HAND DELIVERY

The Honorable Vincent J. Poppiti
Blank Rome LLP
Chase Manhattan Centre, Suite 800
Wilmington, DE 19801-4226

Re: *LG.Philips LCD Co., Ltd. v. ViewSonic Corp., et al.,*
C.A. No. 04-343-JJF

Dear Special Master Poppiti:

I am writing on behalf of defendants Tatung Co. and Tatung Company of America Inc. (collectively, "Tatung"). On Friday, October 6, 2006, Tatung received plaintiff's motion to compel and related documents. Frankly, the motion came as a surprise since I was not informed by counsel for plaintiff that the motion would be filed, had no opportunity to "meet and confer" on the substance of the motion and, perhaps most importantly, the motion did not comply with Your Honor's discovery dispute procedures entered on March 24, 2005 (the "Procedures").

Pursuant to Your Honor's Procedures, a party wishing to submit a discovery dispute to Your Honor must first consult with opposing counsel on "whether the issue can be presented to the Special Master by way of teleconference rather than written submissions". It is clear that plaintiff did not comply with paragraph 2 of the Procedures. Instead, it has written a letter, presumably pursuant to paragraph 3 of the Procedures. Under that paragraph, the due date for our response would be today. However, after receiving plaintiff's motion, counsel for Tatung immediately began a "meet and confer" process through an exchange of several letters.

For these reasons, Tatung respectfully suggests that if the issues raised by plaintiff cannot be resolved this week, then Tatung will file a substantive response on October 23, 2006, followed by a teleconference, if Your Honor believes one is necessary.

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Should Your Honor wish to discuss this or any other matter, counsel is available at Your Honor's convenience.

Respectfully,

A handwritten signature in black ink, appearing to read 'Frederick L. Cottrell, III', with a stylized flourish at the end.

Frederick L. Cottrell, III (#2555)

FLC,III/afg

cc: Clerk of the Court (By Electronic Filing)
Richard Kirk, Esquire
Cormac T. Connor, Esquire
Lora Brzezynski, Esquire
Mark Krietzman, Esquire
Scott R. Miller, Esquire